

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5-77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JAN 24 2014

REPLY TO THE ATTENTION OF:

WC-15J

### <u>CERTIFIED MAIL</u> 7009 1680 0000 7678 5792 RETURN RECEIPT REQUESTED

Windy Ridge Dairy, LLC

Ex. 6 (Personal Privacy

Ex. 6 (Personal Privacy)

Subject:

Clean Water Act Compliance Evaluation Inspection Report

Dear Ex. 6 (Personal Privacy)

On October 31, 2013, U.S. Environmental Protection Agency conducted an inspection of your facility, Windy Ridge Dairy, LLC in Fair Oaks, Indiana. The purpose of the inspection was to evaluate compliance with certain requirements of the Clean Water Act (CWA). Enclosed is a copy of EPA's inspection report.

Windy Ridge Dairy was determined to be a large Concentrated Animal Feeding Operation (CAFO) as defined in 40 C.F.R. § 122 at the time of the inspection. Agricultural operations, such as Windy Ridge Dairy, have been shown to be sources of pollution to local water bodies through improper management resulting in manure and process wastewater runoff at the production and land application area of the CAFO. EPA observed multiple areas of concern during the inspection. The areas of concern are noted in the inspection report. It is important to address these areas of concern as they can contribute pollutants to tributaries of the Iroquois River.

Please provide a written response to the issues identified in the report within 30 days. In your response, include a description of corrective actions taken. Please include a complete description of the rational for Windy Ridge Dairy's calculation of land application rates. Please include a description of Windy Ridge Dairy's land application procedures. Your response should be mailed to:

Donald R. Schwer III Water Division, WC-15J U.S. EPA Environmental Protection Agency, Region 5 77 West Jackson Boulevard Chicago, Illinois 60604 If you have any questions or concerns regarding this letter, or the inspection report, please contact Donald R. Schwer III at (312) 353-8752 or schwer.don@epa.gov. Your cooperation in this matter is appreciated.

Sincerely,

Ryan Bahr, Chief, Section 2

Water Enforcement and Compliance Assurance Branch

Enclosure

Cc: Stu Miller, Indiana Department of Environmental Management

# CWA COMPLIANCE EVALUATION INSPECTION REPORT U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: Compliance Evaluation Inspection Facility: Windy Ridge Dairy 1652 North CR 1100 West Fair Oaks, Indiana 47943 **NPDES Permit Number:** None October 31, 2013 Date of Inspection: **EPA Representatives:** Donald R. Schwer III, Enforcement Officer schwer.don@epa.gov, 312-353-8752 Joan Rogers, Environmental Scientist 312-886-2785 Rhiannon Dee, Program Assistant 312-886-4882 State Representatives: NA , Crop and Manure Manager Facility Representatives: , General Manager Donald R. Schwer III, Enforcement Officer Report Prepared by: Report Date: January 15, 2014

**Inspector Signature** 

### 1. BACKGROUND

The purpose of this report is to describe, evaluate and document Windy Ridge Dairy's compliance with the Clean Water Act (CWA) at its Fair Oaks, Indiana facility on October 31, 2013. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

Windy Ridge Dairy is a Limited Liability Company (LLC) dairy operation in Jasper County, Indiana. It is owned and operated by softward is the Crop and Manure Manager and softward is the General Manager. At the time of inspection, October 31, 2013, the site was at capacity with 7,000 milking and dry cows. The cattle were housed in total confinement. Stated that the facility does not deviate significantly from the number of cattle confined at the facility year round. Windy Ridge Dairy is considered a large dairy Confined Animal Feeding Operation (CAFO) due to the number of mature dairy cows maintained on the facility. Windy Ridge Diary does not currently have a National Pollutant Discharge Elimination System (NPDES) permit allowing discharge from the site. The facility had previously been covered under permit ING806045 issued by the Indiana Department of Environmental Management (IDEM). As of July 2012, the facility has transitioned into Indiana's Confined Feeding Operations (CFO) program.

Surface runoff from the Windy Ridge Dairy site can flow through canal/drainage ways to the Iroquois River that is approximately 1.5 miles from the facility.

### 2. SITE INSPECTION

Prior to beginning the inspection, I conducted a visual reconnaissance of the Windy Ridge Dairy site and its surroundings from the public right-of-way. This included North County Road 1100 W. During my reconnaissance, I searched for areas of environmental concern, discharges, drainage patterns, flow directions, distance and direction of nearest perennial waters, visual condition of perennial waters, facility location and layout.

I arrived at Windy Ridge Dairy at approximately 9:15 a.m. on October 31, 2013. I parked the vehicle at the facility office. The temperature was approximately 66° F and it was raining. The weather station, Rensselaer, IN US (USC00127298), in Rensselaer, IN had an observed rainfall of 0.81 in. on October 31, 2013. Upon arrival, Joan Rogers, Rhiannon Dee, and I put on disposable boots. We entered the farm office. The receptionist called [5x.6 (Personal Privacy)].

that I would be conducting a Concentrated Animal Feeding Operation (CAFO) inspection to evaluate Windy Ridge Dairy compliance with the requirements of the CWA. I explained that the inspection would consist of a review of facility operations, required records, waste generation and management practices, and a visual inspection of the site. I stated that I would document my findings and observations by taking

photographs, obtaining statements from facility staff, and by collecting samples if necessary.

### 2.1 Interview, Nutrient Management Plan (NMP) and Records Review

stated that the facility was at its capacity with approximately 7000 cows. The minimum number of animals since the facility opened in 1999 was approximately 3000 cows. The facility has 50-60 acres devoted to production and approximately 4,000 – 5,000 acres available for land application.

### Livestock Waste Management

Based on the last annual report and confirmation by produces approximately 110,000,000 gallons of manure, litter, and process wastewater per year. Windy Ridge Dairy utilizes suction wagons to collect the manure, process wastewater, and used bedding in the 6 barns. This waste is transferred to the facility's digester. Windy Ridge accepts additional waste from MooTown for use in its manure digester when additional solids are needed for bedding. After digestion, the solid waste is separated by a screw press. The solids from the press are set on a concrete pad for later use as animal bedding. The concrete pad slopes toward a waste storage facility that was originally utilized as a sand separation pit. The liquid from digestion flows through a series of waste holding ponds and sand separation pits. The sand separation pits are now used for additional storage and solids settling. Not all of the waste holding ponds or sand separation pits contain depth markers. The waste storage facilities are all concrete or synthetically lined.

The cows are milked 3 times per day. Non-contact cooling water is recycled as drinking water. The milking parlor and holding pens are flushed to the manure ponds. Teat dip and foot bath chemicals are stored in the milking parlor chemical room. Waste drinking water is collected with the manure in the barns. Mortalities are picked up daily for rendering by Darling.

Feed is stored at multiple locations at the site. The facility has two silage pads on the west end of the site for silage storage. The silage pads are designed so that in low flow conditions leachate and process wastewater runoff is collected. Otherwise, the leachate and process wastewater bypasses the collection system and flows into a ditch and then into the adjacent field. Additionally, feed is stored at the northwest corner of the site and north of the large silage pad. These locations did not have a collection system for leachate or stormwater runoff.

### Land Application

Windy Ridge Dairy is transitioning to marketing and distributing the manure produced on site through the Indiana's CFO regulations. The facility is anticipating distributing a majority of the manure generated through this program. I observed records of manure marketing and distribution.

\*\*CFG regulations\*\* said that Windy Ridge applied manure at plant

uptake rates. The facility is surrounded by fields that utilized the liquid manure for irrigation.

The land application records reviewed did not have documentation regarding the soil conditions or weather at the time of application. Additionally, the land application records reviewed did not provided the amount of nitrogen and phosphorus applied to the facility's fields. I obtained the following documents during the inspection:

- 1. IDEM Compliance Information Summary- October 22, 2009
- 2. Soil Test Results, Field 6, October 2, 2009
- 3. Manure Analysis Report, Sample ID ST-5, May 13, 2013 and June 21, 2013
- 4. Work Orders for Fertilizer Application, June 15, 2013 to October 18, 2013

The IDEM Compliance Information Summary document summarized the nitrogen and phosphorus application rates dependent on crop rotation and management practices. The Soil Test Results document for Field 6, dated October 2, 2009, showed an average of 323 lbs phosphorus per acre. The Manure Analysis Reports, which said were representative of the waste applied to the irrigated fields, are summarized in Table 1.

Sample ID: ST-5		Total Pounds I	Per 1000 Gall	lons	
Date Sampled	Total Kjeldahl Nitrogen (TKN)	Ammonium (NH <sub>4</sub> -N)	Organic Nitrogen	Phosphorus (P <sub>2</sub> 0 <sub>5</sub> )	Potassium (K <sub>2</sub> 0)
5/13/2013	10.1	7.5	2.6	1.7	14.4
6/21/2013	13.1	9.6	3.5	3.4	16.3

The manure application records are summarized in Table 2 for the irrigation fields. The total gallons applied for the fields may be biased low due to incompleteness of records. The data recorded for applications to a combination of fields were weighted equally for both fields (i.e. if 300,000 gallons were applied to Field ID: 6 & 11, the gallons applied to Field 6 was calculated as 150,000 gallons and the gallons applied to Field 11 was calculated as 150,000 gallons). A summary of the Work Orders are located in Attachment 1. The field size was based off of documents obtained with IDEM's virtual file cabinet. The field locations and size documents are located in Attachment 2. The manure application spanned the dates of June 15, 2013 to October 18, 2013.

Field ID	Field Size (Acres)	Total Gallons Applied*	Gallons per Acre
6	269	20,175,800	75,003
9	140	8,799,850	62,856
10	261	10,133,500	38,826
11	255	25,025,850	98,141

<sup>\*</sup>calculated from Work Order records, actual number may differ depending on completeness of the records reviewed and collected onsite.

Windy Ridge Diary calculated the agronomic rates for nitrogen and phosphorus applications in its IDEM Compliance Information Summary dated October 22, 2009. The calculated agronomic rates for corn silage on an irrigated field were 245 lb plant available nitrogen (PAN) per acre and 99 lbs P<sub>2</sub>O<sub>5</sub> per acre. The calculated agronomic rates for rye on an irrigated field were 110 lb PAN per acre and 71 lbs P<sub>2</sub>O<sub>5</sub> per acre.

The nutrient application rates applied per acre of land are summarized in Table 3. The calculated rate of NH<sub>4</sub>-N applied to the fields range from 291 to 942 lbs per acre depending on the manure analysis used. The calculate rate of organic nitrogen applied to the fields ranged from 101 to 343 lbs per acre depending on the manure analysis used. The calculated rate of  $P_2O_5$  applied to the fields ranged from 66 to 334 lbs per acre depending on the manure analysis used. These application rates exceed the agronomic rates in many instances.

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					lbs	er acre	-		4	
Field ID	Low	High	Low	High	Low	High	Low	High	Low	High
6	758	983	563	720	195	263	128	255	1,080	1,223
9	635	823	471	603	163	220	107	214	905	1,025
10	392	509	291	373	101	136	66	132	559	633
11	991	1,286	736	942	255	343	167	334	1,413	1,600

<sup>\*</sup>The Low estimate was calculated based on the May 13, 2013 manure sample. The High estimated was calculated using the June 21, 2013 manure sample.

Rainfall data from the weather station, USC00127298, in Rensselaer, IN which is approximately 9-10 miles southeast of the facility were correlated with the land application dates. Land application occurred on the following dates in which rainfall amounted in greater than .25 inches of rain: June 22, 2013 - .81 inches, June 25, 2013 - 0.26 inches, August 3, 2013 - 1.05 inches, September 12, 2013 - 0.93 inches, and October 4, 2013 - 0.25 inches of rain were documented. The rainfall data is exhibited as Attachment 3.

### 2.2 Walkthrough of the Facility

To facilitate the walkthrough section of this report, overview images are included in Attachment 4 which includes building labels and waterway locations. The inspection photographs are in Attachment 5.

The walkthrough portion of the inspection began at the office. EPA on the inspection walkthrough. We drove to the center of the facility and exhibited the Manure Digester, E22, and the Dried Manure Storage Building, E24. E24 drained to the Sand Separation Device, E11. We continued to the north side of the facility. On the

northwest side of the facility, north of Waste Storage Pond, E21, there was a feed storage area. I observed that there was not containment for process wastewater at this feed storage area. The runoff from this feed storage area looked like it flowed east and north into the adjacent field. I could not discern the final disposition of the process wastewater from this feed storage area. The process wastewater appeared to be contained in the area north of the facility during this precipitation event.

We continued south toward the Silage Pad, E18. I observed another feed storage area between E21 and E18. I observed that there was not containment for process wastewater at this feed storage area. The runoff from this feed storage area flowed west into a ditch along the west end of E18 and then into Field 9 along the west end of the facility.

E18 and Silage Pad, E19, contained a leachate collection system to collect silage leachate which is transferred to the Leachate Collection Pit, E20. Said the Leachate Collection Pit is pumped to the Waste Storage Pond, E21. During the rainfall event at the time of the inspection, runoff from E18 and E19 was bypassing the leachate collection system. The bypassed process wastewater flowed west from E18 and E19 into ditches adjacent to the west side of E18 and E19. Subsequently, this process wastewater runoff flowed from the ditches into Field 9 along the west end of the facility. Photographs IMGP0372- IMGP0375 and IMGP0382- IMGP0387 in Attachment 5 show the bypass of process wastewater into the ditches and into Field 9. The transfer system for silage leachate collection for E19 contained solids buildup (Attachment 5: IMGP0379 – IMGP0381). We continued around the south end of the facility and back to the office concluding the inspection walkthrough.

### 2.3 Closing Conference and Post-Inspection

- Windy Ridge Dairy did not contain all the process wastewater generated at the Silage Pads and other feed storage areas.
- 2. A cursory overview of the application records indicated that Windy Ridge Dairy may be applying manure in excessive quantities to Field 6.

I explained Windy Ridge Farm's right to make a claim of business confidentiality and presented with a Confidentiality Notice. Confidentiality Claims at the time of the inspection. I provided with the following compliance assistance materials:

- EPA's CAFO Final Rulemaking Fact Sheet
- NRCS EQIP program brochure
- EPA's Small Business Resources Information Sheet

The inspection ended at 2:10 p.m.

### 3. AREAS OF CONCERN

EPA observed these areas of concern whereby pollutants have the potential to reach waters of the United States:

- 1. Windy Ridge Dairy did not containing all the process wastewater generated at the Silage Pads and other feed storage areas. The process wastewater could flow into ditches that flow out to Field 9. If process wastewater discharges to a Water of the United States (WOUS), it would be violation of the CWA.
- 2. An overview of the application records indicated that Windy Ridge Dairy may be applying manure in excessive quantities to Fields 6, 9, and 11. Additionally, manure application occurred on the same day as rainfall events. The land application records did not document soil or weather conditions at the time of application. If manure or process wastewater discharges to a WOUS due to inadequate site specific nutrient management practices, it would be a violation of the CWA.

## LIST OF ATTACHMENTS

- Work Order Land Application Summary
   Land Application Sites
- 3. Rainfall Data USC00127298
- 4. Overview photographs of Windy Ridge Dairy
- 5. Inspection Photographs

# ATTACHMENT 1: WORK ORDER LAND APPLICATION SUMMARY

	Total	Number of Pivot		
Date	Gallons	Rotations	Farm ID	Field ID
6/15/2013	3,000,000	1	WR	6
6/17/2013	1,146,500	2	WR	(
6/19/2013	3,012,200	2.5	WR	11
6/22/2013	1,494,700	1	WR	10
6/24/2013	2,617,900	. 2	WR	11
6/25/2013	739,600	0.5	WR	(
6/28/2013	334,900	0.5	WR	(
6/29/2013	1,477,400	4	WR	9
7/5/2013	1,802,800	4	WR	11
7/9/2013	811,300	1	WR.	3
			Calf	
7/9/2013	746,400	4	Land	- 1
7/10/2013	4,706,600	3	WR	1
7/11/2013	1,540,400	2	WR	(
7/13/2013	2,536,900	1.5	WR	10
7/15/2013	801,500	5	WR	9
7/17/2013	357500	_	WR	6 and 11
			Calf	
7/18/2013	1,141,700	6	Land	-
7/24/2013	870200	-	WR	6 and 9
8/1/2013	247900		WR	6 and 9
8/3/2013	270000		WR	6 and 11
8/5/2013	1,396,700	4	WR	1.
8/10/2013	1,023,500	1	WR	10
8/12/2013	816000	-	WR	6 and 9
8/15/2013	920,000	1	WR	1
8/16/2013	1,054,800	1	WR	1
8/17/2013	1315900	-	WR	6 and 9
8/21/2013	1,319,700	2	WR	1
8/24/2013	1388000	-	WR	6 and 9
9/4/2013	1,400,400	1	WR	10
9/12/2013	1847100		WR	6 and 9
9/23/2013	1,417,600	. 1	WR	1
9/24/2013	1,129,100	1. 1	WR	1
9/25/2013	1,145,600	1	WR	1
9/26/2013	1,220,400	1.	WR	1
9/27/2013	1,029,800	1	WR	1

11	WR	0.75	765,000	9/28/2013
11	WR	0.25	88,600	9/30/2013
6	WR	0.25	532,000	10/1/2013
11	WR	0.5	446,400	10/1/2013
6	WR	0.25	531,600	10/2/2013
11	WR	0.5	638,900	10/2/2013
6	WR	0.25	552,500	10/3/2013
6	WR	0.25	554,500	10/4/2013
9	WR	2	530,400	10/4/2013
6	WR	0.25	453,800	10/5/2013
9	WR	1	382,200	10/5/2013
. 6	WR	0.25	613,200	10/7/2013
9	WR	2	557,200	10/7/2013
6	WR	0.25	656,100	10/8/2013
9	WR	2	541,100	10/8/2013
6	WR	0.25	671,300	10/9/2013
9	WR	2	564,100	10/9/2013
6	WR	0.5	950,200	10/10/2013
9	WR	3	703,400	10/10/2013
6	WR	0.25	549,400	10/11/2013
6	WR	0.25	512,500	10/12/2013
10	WR	0.33	605,400	10/12/2013
6	WR	0.25	608,100	10/14/2013
10	WR	0.25	690,900	10/14/2013
6	WR	0.25	770,400	10/15/2013
10	WR	0.33	693,400	10/15/2013
6	WR	0.25	755,900	10/16/2013
10	WR	0.5	644,300	10/16/2013
6	WR	0.5	624,500	10/17/2013
10	WR	0.5	593,600	10/17/2013
6	WR	0.25	522,100	10/18/2013
10	WR	0.25	450,400	10/18/2013

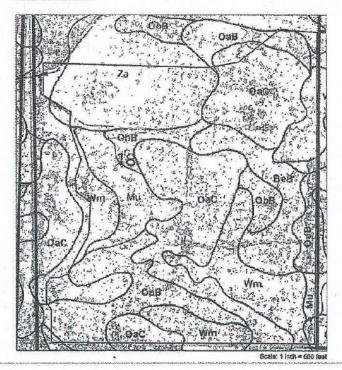
### Ex. 6 (Personal Privacy),

National Pollutant Discharge Elimination System

Land Application Site Windy Ridge Dairy

### Field: System 6

269 Available Acres



EarthWise, Inc. September 2005

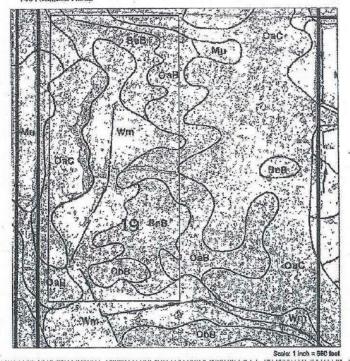
### Ex. 6 (Personal Privacy

National Pollutant Discharge Elimination System

Land Application Site Windy Ridge Dairy

Field: System 9

140 Available Acres



EarthWise, Inc. September 2005

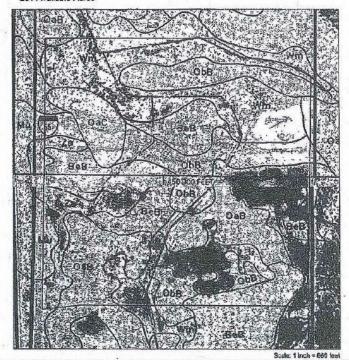
#### Ex. 6 (Personal Privacy

National Pollutant Discharge Elimination System

Land Application Site Windy Ridge & Hidden View Dairies

Field: System 10

261 Available Acres



EarliWise, inc.

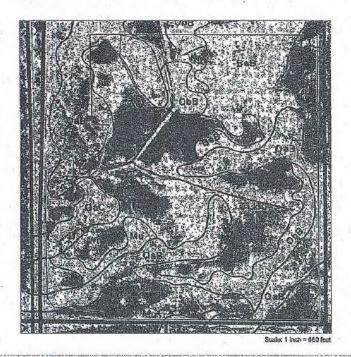
#### Ex. 6 (Personal Privacy)

National Pollutant Discharge Elimination System

Land Application Site Windy Ridge Dairy

Field: System 11

255 Available Acres



EarthWise, Inc. September 2005

# Attachment 3: RAINFALL DATA - USC00127298

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-	2013	7	20	73	46	EA.	6.03	503,833,40	0.0	15	0		2007/15/20						
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<sup>&</sup>quot;Grand Cover: InGrate: 24Faffen; 34Gate Gebend: 45Erdere geben: 54Eed; 64Biten mulet; 74Grass merch; 14Gate mode; (41fthrose

<sup>&</sup>quot;2" This data value balved and of NCOC's quality control locals.

""" values in the Procedualist basebary above indicates a TRACE value was recorded.

<sup>&</sup>quot;a" value in the Prochitation Flag or the Stree Flag column indicate a multiply tital, accountable time featments which is being detail.

(See value inconstruence which is street in the self-column defeat from the process from 2 metrics with in street in the feat is referred to print in self-column.)

# Record of Climatological Observations These date are quality controlled and may not be identical to the original observations.

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Record of Climatological Observations
These data are quality controlled and may not be
identical to the original observations.

		T	T		Facqueratus			P <sub>2</sub>	ecipitation(see	1")		Evap	ration	200		Soil Terus	recoduces (°F).		
					tes soding observation three	at 0 - 9	- 3	# Flour A at obse	mients enling nation ime		Al Cos Tics:				4 in copfs			8 to August	
	¥ ***	e n t	D A Y	Max.	Min.	2 0 1 1 2 2 2	Harry Halled Street, also (21)	1-80	Source, sour pellots, tail fini		Scraw, Ica polisis, hut, ice co ground (b)	Movement)	Amount of Even.	Ground Cover (tox 1)	Max	Mys.	Cover Cover (see ")	Mex.	Ma
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"The State to share billion and a NICCE spelling section lettle.

"A" value in the Prancise originary and the billion and situation of the original and the ori

U.S. Department of Commocco .
National Oceanin & Altrospheric Administration .
National Conference and Guerring, Scholand in New Mockey .

# Record of Climatological Observations These data are quality could led and may not be stronged to the original observations.

National Climato Basia Central Section Busia Cardinal (O) Patasa Antonia Automias Horas Cardinal Section Section Section 2000

		1	1		Temperatu	n(F)		Pi	eripitation(se	2**		Evapo	Haffeet			Soil Time	esatare (TF)	Zanta.	
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	7.4.	n .	D A Y	idas.	Solan.	* 1 × 5 = = 0	Rah, welas aram, est. 94	F . a g	Snow like pelists, 193 (tr)	F 1 9	Show, los policis, had, los on ground (Hg)	Movement	newers of lives. (H)	Ground Cover (100 h)	ttes	Min	Ground Cover pee *j	Max	Men
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THE "Tings in Profinitions indicate the crain-have red completed processing and quality control and may not to identical to the original observation.

Single, or have, reas measure that is the encountries was not expected.

<sup>&</sup>quot;Richard Cover: Selbeur, Driving State Green, editores, editores green, de Des, de Deservació. Felicar medi; leibro esa; la Geldegam "N" Tala dels value billad que ni NCDE's covillo condecidante.

<sup>&</sup>quot;I" valuation the Percipitation delegate shows reptaggs 4 TRACE value was recorded.

<sup>&</sup>quot;X" religional the Procliptington Dog on the drown flag octume histories a montainy total, accumulated share less respectivement, in heling point.

One wake inconsistency may be present due to respecting cataloxicals during the convention process from Similating color to standard importal soil.

### ATTACHMENT 4: AERIAL PHOTOGRAPHS OF WINDY RIDGE DAIRY

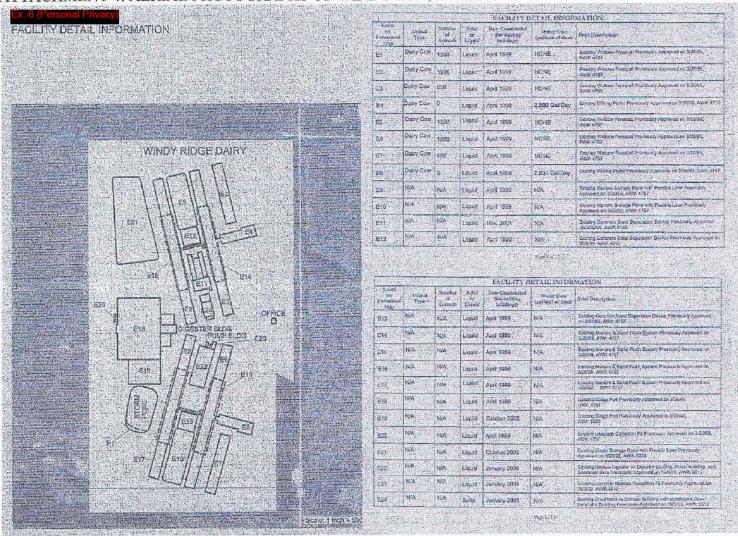
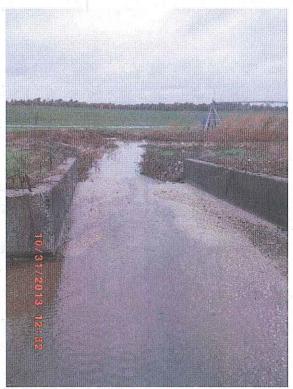


Figure 4.1: Windy Ridge Dairy Facility Layout: Note P1 is now synthetically lined and used as a waste storage pond.



### ATTACHMENT 5: INSPECTION PHOTOGRAPHS

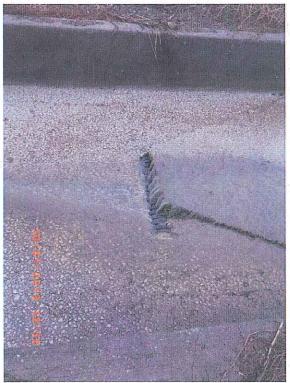


1: IMGP0372.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: West

Description: On the west end of the facility, runoff from the Silage Pad, E18, flows west through this system in which the silage leachate is collected and transferred to Wastewater Storage Pond, E21. A portion of the process wastewater bypassed the collection system and

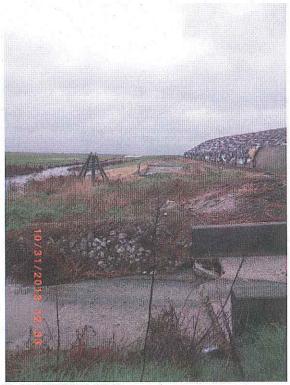
flowed west from E18 into a ditch.



2: IMGP0373.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

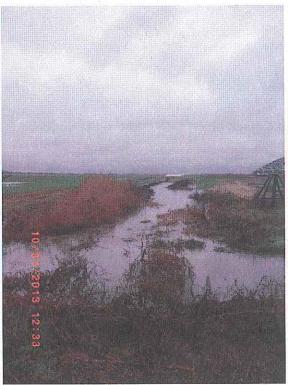
Description: On the west end of the facility, runoff from the Silage Pad, E18, flows west through a system in which the silage leachate is collected and transferred to Wastewater Storage Pond, E21. A portion of the process wastewater bypassed the perforated pipe and flowed west from E18 into a ditch adjacent to the west side of the E18. Subsequently, the bypassed process wastewater runoff flowed from the ditch into Field 9 along the west end of the facility.



3: IMGP0374.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: North

Description: A portion of the process wastewater bypassed the collection system and flowed west from E18 into a ditch adjacent to the west side of the E18. Subsequently, the bypassed process wastewater runoff flowed from the ditch into Field 9 along the west end of the facility.



4: IMGP0375.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: North

Description: A portion of the process wastewater bypassed the collection system and flowed west from E18 into this ditch adjacent to the west side of the E18. The bypassed process wastewater runoff flowed north in the ditch and outlet into Field 9 along the west end of the

facility.



5: IMGP0376.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

Description: Water was flowing out of a break in a T connection of a well pipe system located west of E18 see (Personal Privacy) believed that the water was being transferred through a break in an abandoned center pivot irrigation pipe located to the north of the well pipe system near the ditch adjacend to the west side of E18.



6: IMGP0377.JPG

Location: Windy Ridge Dairy
Photographer: Rhiannon Dee
Camera Direction: Down
Description: Slight oil staining near a pump near the well pipe system.



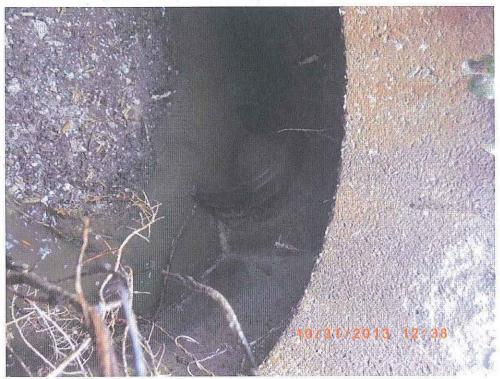
7: IMGP0378.JPG

Location: Windy Ridge Dairy
Photographer: Rhiannon Dee
Camera Direction: Down
Description: The pump and well pipe system.



Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

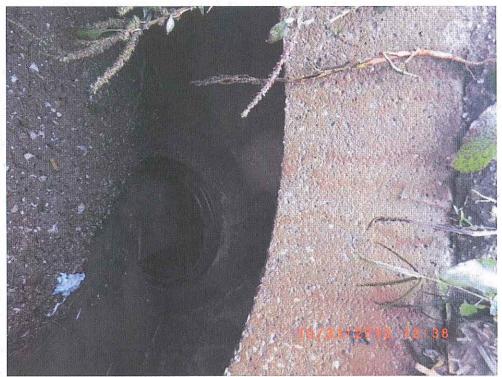
Description: Near Silage Pad, E19, a manhole in the transfer system for the silage leachate collection system contained solids buildup.



9: IMGP0380.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

Description: The process wastewater flows out of the pipe. The manhole in the transfer system for the silage leachate collection near Silage Pad E19 contained solids buildup.



10: IMGP0381.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

Description: The process wastewater flows out of the pipe. The manhole in the transfer system for the silage leachate collection near Silage Pad E19 contained solids buildup.



11: IMGP0382.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Southwest

Description: On the west end of the facility, a portion of the process wastewater from silage pad, E19, bypassed the silage leachate collection system. The bypassed process wastewater flowed west from E19 into this ditch adjacent to the west side of the E19. Subsequently, the bypassed process wastewater runoff flowed south in the ditch and west into Field 9 along the west end of the facility.



12: IMGP0383.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

Description: Process wastewater flowed west from E19 into this ditch adjacent to the west side of the E19. The process wastewater enters the ditch near the concrete structure. Erosion

had occurred due to inadequate stabilization.



13: IMGP0384.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

Description: Process wastewater flowed west from E19 into this ditch adjacent to the west side of the E19. The process wastewater enters the ditch near the concrete structure. Erosion

had occurred due to inadequate stabilization.



14: IMGP0385.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: West

Description: On the west end of the facility, runoff from the Silage Pad, E19, flows west through this system in which the silage leachate is collected with a perforated pipe near the end of the concrete structure and transferred to Wastewater Storage Pond, E21. A portion of the process wastewater bypassed the collection system and flowed west into a ditch.



15: IMGP0386.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

Description: On the west end of the facility, runoff from the Silage Pad, E19, flows west through a system in which the silage leachate is collected and transferred to Wastewater Storage Pond, E21. A portion of the process wastewater bypassed the perforated pipe and

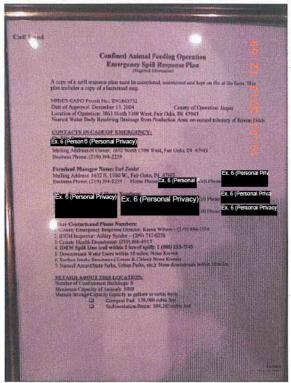
flowed west into the ditch adjacent to the west side of the E19.



16: IMGP0387.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: Down

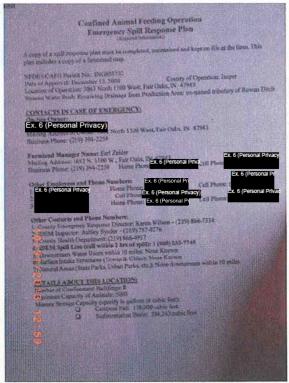
Description: Part of the concrete structure was dilapidated where the bypassed process wastewater entered the ditch.



17: IMGP0388.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee Camera Direction: NA

Description: Calf Land Emergency Spill Response Plan.



18: IMGP0389.JPG

Location: Windy Ridge Dairy Photographer: Rhiannon Dee

Camera Direction: NA

Description: Calf Land Emergency Spill Response Plan.